

Exhibit G

<p>1 2 UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK 3 -----x</p> <p>4 LEVI HUEBNER on behalf of himself and all other similarly situated consumers, 5 6 Plaintiff, 7 8 v. 14-cv-6046 (BMC) 9 10 MIDLAND CREDIT MANAGEMENT, INC., and MIDLAND FUNDING, LLC, 11 12 Defendants. 13 14 -----x 15 August 24, 2015 16 10:40 a.m. 17 18 Deposition of ANGELIQUE D. ROSS, taken 19 by plaintiff, pursuant to Federal Rule 30 20 (b)(6), at the offices of Pirozzi & Hillman, 21 16 West 36th Street, New York, NY 10018, 22 before Joseph B. Pirozzi, a Registered 23 Professional Reporter and Notary Public of 24 the State of New York. 25</p>	<p>1 2 STIPULATIONS 3 4 IT IS HEREBY STIPULATED AND AGREED, by 5 and between counsel for the respective 6 parties hereto, that all objections, except 7 as to form, are reserved to the time of 8 trial. 9 IT IS FURTHER STIPULATED AND AGREED 10 that the deposition may be signed and sworn 11 to before any officer authorized to 12 administer an oath. 13 IT IS FURTHER STIPULATED AND AGREED 14 that the sealing and filing of the 15 deposition be waived. 16 17 18 19 20 21 22 23 24 25</p>
<p>1 2 APPEARANCES: 3 4 5 POLTORAK PC 6 Attorneys for plaintiffs 7 26 Court Street 8 Suite 908 9 Brooklyn, NY 11242 10 BY: JACOB T. FOGEL 11 of Counsel 12 13 14 MARSHALL DENNEHY WARNER COLEMAN & GOGGIN 15 Attorneys for defendants 16 Wall Street Plaza 17 88 Pine Street 18 New York, NY 10005 19 BY: MATTHEW B. JOHNSON 20 21 22 PRESENT: 23 LEVI HUEBNER 24 25</p>	<p>1 Ross 2 ANGELIQUE D. ROSS, 3 called as a witness, having been duly 4 sworn, testified as follows: 5 EXAMINATION 6 BY MR. FOGEL: 7 Q. Okay. Good morning, Ms. Ross. 8 My name is Jacob Fogel. I'll be asking you 9 questions with regards to the case called 10 Levi Huebner versus Midland Credit 11 Management Corporation. 12 If for any reason you don't 13 understand a question, please let us know, 14 I will be happy to repeat, rephrase, or 15 have the court reporter read it back. 16 Also, just for clarity purposes, 17 we can't talk over each other. So I'll 18 wait until you finish your answer and, 19 hopefully, you will wait until I finish my 20 question. 21 In addition, you can gesture with 22 your hands but also a verbal response is 23 necessary so we have something on the 24 record. 25 If you need a break for any</p>

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 2 AFTERNOON SESSION
 3 2:21 p.m.
 4 EXAMINATION CONTINUED
 5 BY MR. FOGEL:
 6 Q. Does MCM accept verbal disputes
 7 to debts over the phone?
 8 A. I'm sorry, can you repeat the
 9 very last part?
 10 Q. Does MCM accept verbal debts over
 11 the phone?
 12 MR. JOHNSON: Objection to form.
 13 Q. I'm sorry, I'll just take that
 14 question back and we'll ask again.
 15 Does MCM accept verbal disputes
 16 to debts over the phone?
 17 A. Yes.
 18 Q. And can you tell us, if someone
 19 would be calling MCM to dispute a verbal
 20 debt, who would pick up or what's the title
 21 of the person that would pick up that call?
 22 A. I don't know what you mean by
 23 verbal debt.
 24 Q. In other words, if you wanted to
 25 verbally dispute a debt and you call MCM

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 2 and someone picks up the phone, who's the
 3 one that does that?
 4 A. If you are disputing, it can be
 5 either an account manager or Consumer
 6 Support Services.
 7 Q. And the initial person could be
 8 either one?
 9 A. It depends on which number you
 10 called. If you just called the number on
 11 the letter, it would go to an account
 12 manager first.
 13 Q. And then if someone wanted to
 14 actually dispute the debt, would the
 15 account manager refer them to someone else?
 16 A. I'm sorry, I don't understand
 17 that question.
 18 Q. The account manager is the first
 19 one to pick up if you called the number on
 20 the letter, is that correct?
 21 A. Yes.
 22 Q. And then would the account
 23 manager be able to take the disputed debt
 24 and write it down as disputed or would he
 25 have to send it to another location?

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1 Ross
 2 A. No. He could, everyone that
 3 speaks to a consumer can mark the account
 4 as disputed. For additional help with
 5 resolution of the dispute they would
 6 transfer it to Consumer Support Services.
 7 Q. Okay. And let's say there was no
 8 request for additional support services,
 9 let's say, somebody said, I dispute the
 10 debt, what would the account manager do
 11 then?
 12 A. It depends on, I mean did they
 13 hang up? If the person just hung up,
 14 there's no one to transfer.
 15 Q. I'm not talking about if they
 16 hung up. A person says, I'm disputing a
 17 debt, the account manager, what does the
 18 account manager supposed to do, is he
 19 supposed to then take down the disputed
 20 debt as he said, that the debt is disputed?
 21 MR. JOHNSON: Objection to form.
 22 A. When you mean take down, do you
 23 mean document?
 24 Q. Right.
 25 A. What do you mean?

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 2 Q. Okay. When a person says, I'm
 3 disputing a debt to an account manager,
 4 what does the account manager do next?
 5 A. The account manager will document
 6 the account. They can code the account as
 7 disputed and/or transfer the account over
 8 to Consumer Support Services.
 9 Q. After the account manager
 10 documents the account, what does the
 11 account manager tell the consumer?
 12 MR. JOHNSON: Objection to form.
 13 A. Tell them in relation to what?
 14 Q. He just said, I dispute the debt,
 15 okay, and you just told me that the account
 16 manager is supposed to take that down.
 17 What is the next thing that the account
 18 manager is supposed to tell the consumer?
 19 MR. JOHNSON: Objection to form.
 20 A. I don't, I mean, do you mean
 21 generally what they might say?
 22 Q. Right.
 23 A. If they are going to transfer
 24 them, they likely would tell them they were
 25 transferring them to another department.

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2 Q. Okay. And would the manager

3 actually tell them, we accept your dispute,

4 or anything like that or just transfer,

5 tell them, okay, now I'm going to transfer

6 you? What is he supposed to tell them

7 before he transfers them?

8 MR. JOHNSON: Objection to form.

9 A. There's no language about

10 accepting. We accept all disputes. So

11 saying that is strange to me.

12 Q. So once a consumer says, I

13 dispute a debt, you do not have to inform

14 the consumer that your debt is disputed?

15 A. The consumer is telling us they

16 are disputing, so I don't understand the

17 question.

18 Q. So once -- that's the question.

19 The consumer is saying, I'm disputing a

20 debt. Does the account manager have to say

21 that your debt is disputed?

22 MR. JOHNSON: Objection to form.

23 A. No. They don't. They can say,

24 okay. They may say, okay, I understand.

25 Q. Can they ask them why they are

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2 disputing the debt?

3 A. Sure, they can ask. They can.

4 They don't have to.

5 Q. Is that the usual policy to ask

6 why the consumer is disputing the debt?

7 A. It can be. It depends, because

8 we're trying to understand how to resolve

9 it. So there may be some questions as to

10 what the general dispute is so that the

11 dispute can be resolved. Generally, that

12 doesn't happen with an account manager. It

13 happens within Consumer Support Services.

14 Q. Okay. So just to make it clear,

15 the account manager would not have to tell

16 the consumer that the debt is disputed

17 after he asks to say that the debt is

18 disputed, is that correct?

19 MR. JOHNSON: Objection to form.

20 A. I don't think that's what I

21 understood your question to mean.

22 Q. Okay. So once the consumer says,

23 okay, my debt is disputed, the account

24 manager is not obligated to tell him that

25 his debt is disputed, that's what you are

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2 saying?

3 MR. JOHNSON: Objection to form.

4 A. I don't think that's what I'm

5 saying. I don't know if I understand your

6 question.

7 Q. Tell me in your own words, the

8 way I understood what you told me is that

9 if a consumer calls up and said, the debt

10 in the letter that you just sent, the usual

11 letter that you send out, is disputed, the

12 account manager do does not necessarily

13 have to tell them, yes, your debt is

14 disputed, is that what you are saying?

15 MR. JOHNSON: Objection to form.

16 A. I still don't think that's what

17 I'm saying.

18 Q. Can you tell me what the next

19 step after the debtor says -- after the

20 consumer says the debt is disputed, what is

21 the next step that the account manager is

22 supposed to do?

23 A. It depends. So they may transfer

24 it or they may ask a question regarding the

25 dispute. A lot of times it's just a

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2 transfer.

3 Q. Okay. And is there any

4 guidelines for this account manager as to

5 what he's supposed to do?

6 A. Yes.

7 Q. Do you have those guidelines?

8 A. They would be produced in

9 documents.

10 Q. Without those guidelines, do you

11 know what they are?

12 A. Generally, yes.

13 Q. Could you tell us what they are?

14 MR. JOHNSON: If you are going to

15 ask her about the policy, she'd rather

16 look at the exhibit.

17 Q. Okay. The question is, before we

18 get to the exhibit, you just said that you

19 know what they are. So I'm asking again,

20 what is the account manager supposed to do

21 after the consumer says, I'm disputing a

22 debt?

23 MR. JOHNSON: Objection to form.

24 A. I mean I can give you the

25 step-by-step in the document. We produced